



South Coast Air Quality Management District

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FAXED: JANUARY 5, 2007

January 5, 2007

Mr. Raynald F. Pascua, Director
Development Services Department
City of Placentia
401 E. Chapman Avenue
Placentia, CA 92870

**Draft Mitigated Negative Declaration (Draft MND) for the Proposed for Tentative
Tract Map No. 16839 for ETCO development, Inc.**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Mitigated Negative Declaration (Final MND).

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Negative Declaration. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Steve Smith, Ph. D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:GM

ORC061208-01
Control Number

Localized Significance Threshold

1. Because the proposed site is located less than a quarter-mile north, east and west from existing high-density, multi-family residential uses, a localized air quality analysis may be warranted to ensure that the residents in the existing residences are not adversely affected by the construction activities that are occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis can be found at the following web address: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html> .

Construction Mitigation Measures

2. In addition to the mitigation measures proposed by the lead agency on page 45, the SCAQMD recommends that the lead agency consider adding the following mitigation measures to further reduce volatile organic compounds (VOC) impacts from the project, if feasible:

VOC

Recommended Additions:

- Use required coatings and solvents with a VOC content lower than required under Rule 1113;
- Construct/build with materials that do not require painting;
- Use pre-painted construction materials.

Siting of Sensitive Land Uses Near Rail Uses

3. California Air Resources Board (CARB) has published the “Air Quality and Land Use Handbook: A Community Health Perspective (April 2005) “(Handbook), which is available at the following website: <http://www.arb.ca.gov/ch/aqhandbook.htm> . This document recommends against siting projects that include sensitive land uses (schools, residences, playgrounds, convalescent centers, nursing homes, long-term health care facilities, etc.) close to rail yards because of potential exposures to diesel particulate emissions from diesel train engines that may lead to adverse health effects beyond those associated with regional air pollution in urban areas. The key observation according to these studies cited in the CARB Handbook is that “close proximity [to a source of diesel particulate emissions] increases both exposure and the potential for adverse health effects.”

According to the Draft MND, the proposed condominium project is located adjacent to the BNSF railroad tracks. There is no indication in the Draft MND what the frequency of railroad trips near the proposed project site is or whether or not there is a rail yard in the vicinity. In any event, the lead agency should locate the condominiums as far as possible from the railroad tracks. The lead agency is referred

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to the CARB Handbook for additional information regarding siting sensitive land uses near sources of diesel particulate matter.